

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

Terance Taylor  
Plaintiff:

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Judge:  
Magistrate:

FILED: JUNE 20, 2008  
08CV3554  
JUDGE MAROVICH  
MAGISTRATE JUDGE SCHENKIER  
RCC

P.O. Chris Feil Star # 15981 and P.O.  
Brian Baader #7582

COMPLAINT

Now comes the plaintiff, by and through his attorney, Thomas G. Morrissey, Ltd. and  
complain of the defendants as follows:

This is a civil action arising under the Fourth, Fifth and Fourteenth Amendments to the  
United States Constitution and under Title 42 U.S.C. Sections 1983 and 1988. The jurisdiction of  
this Court is conferred under 28 U.S.C. Sect. 1343.

COUNT ONE

1. Plaintiff, Terance Taylor is a resident and citizen of the State of Illinois.
2. Defendants Chris Feil and defendant Brian Baader, were at all times material to this  
complaint, duly appointed police officers of the Chicago Police Department and at all times the  
defendants were acting under color of law of the State of Illinois.
3. On January 16, 2008, the plaintiff, Terance Taylor, and various family members  
went to the Chicago Police station located at 727 E. 111<sup>th</sup> St. to inquire about an uncle who had  
been placed under arrest that day and transported to the police station.
4. After an officer working the front desk at the station told the family members that

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they would not be allowed to see their relative, the plaintiff's brother Perry got into an argument with one of the defendants. As the plaintiff and the members of his family were leaving the station, one of the defendants yelled out to the plaintiff's brother that he "would kick his ass and his uncle's ass".

5. Defendants Feils and Baader then followed the plaintiff and his family as they left the station. When the plaintiff was outside the station, one of the defendants grabbed the plaintiff by the front of the shirt and told him to place his hands behind his back. The defendant then escorted the plaintiff back into the station.

6. Inside the station, the plaintiff was told by one of the defendants to get down on the floor and to place his hands behind his head. The plaintiff complied with the request and did not resist the arrest. When he asked the defendants why he was being arrested, one of the defendants placed his knee on the back of the plaintiff's neck head and the other defendant began kicking the plaintiff and telling him to be quiet.

7. Defendants then placed the plaintiff under arrest for aggravated assault of a police officer and resisting arrest.

8. As a result of the beating by the defendants, plaintiff suffered lacerations to body, and injuries to his back and neck.

9. As a result of the unlawful and malicious abuse of plaintiff, the defendants deprived the plaintiff of his rights under the Fourth, Fifth and Fourteenth Amendments .

Wherefore, plaintiff prays for an award as follows:

A. Award the plaintiff compensatory damages against the defendants in an amount in excess of \$50,000.

B. Award the plaintiff punitive damages against the defendants in an amount in excess of \$50,000.

C. Award the plaintiff court costs and attorney fees under 42 U.S.C. Sect. 1988.

## COUNT TWO

1-9 Plaintiff realleges paragraphs 1-9 of Count One as paragraphs 1-9 of Count Two.

10. That the arrest of the plaintiff by the defendants was without reasonable grounds for the defendants to believe that the plaintiff had committed any offense and the defendants knew that they were without probable cause to arrest the plaintiff.

11. That as a result of the arrest, the plaintiff was deprived of his liberty, and placed in the lockup at the station overnight.

12. That plaintiff was brought to court the next morning and the criminal charges were dismissed.

13. As a result of the unlawful arrest and detention of the of plaintiff, the defendants deprived the plaintiff of his rights under the Fourth, Fifth and Fourteenth Amendments .

Wherefore, plaintiff prays for an award as follows:

A. Award the plaintiff compensatory damages against the defendants in an amount in excess of \$50,000.

B. Award the plaintiff punitive damages against the defendants in an amount in excess of \$50,000.

C. Award the plaintiff court costs and attorney fees under 42 U.S.C. Sect. 1988.

Respectfully submitted,

/s/ Thomas G. Morrissey

Attorney for the Plaintiff

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